

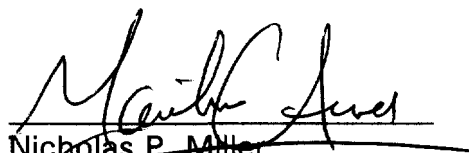
VII. THE COMMISSION SHOULD ADVANCE COMPETITIVE NEUTRALITY BY ADOPTING MEASURES THAT WILL ALLOW ALL TYPES OF SERVICE PROVIDERS TO SERVE SCHOOLS AND LIBRARIES.

Several parties have noted that the Joint Board has recommended that the Commission adopt competitive neutrality as a principle for developing universal service policies, and that support should be available regardless of the particular technology a service provider uses. See, e.g., Comments of Cellular Telecommunications Industry Association at 4. We agree. Schools and libraries should have the opportunity to obtain services in the most technically efficient and cost-effective manner. The Commission's rules should not favor any particular technology or class of provider, and schools and libraries should have a realistic opportunity to obtain service from a broad range of providers.

Conclusion

EDLINC again urges the Commission to adopt rules ensuring that all eligible schools and libraries have access to the broadest permissible range of services, at prices that will deliver the benefits of modern telecommunications technology nationwide. The broad support for the Joint Board Recommendations indicates that the Commission is on the right track: the Commission should not allow a handful of commenters to derail the progress that has been made.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nicholas P. Miller", is written over a horizontal line.

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January 10, 1997

APPENDIX A -- DESCRIPTION OF EDLINC MEMBERS

EDLINC is a coalition of educational and library groups that have been working together to provide schools and libraries with affordable access to telecommunications and to ensure the effective implementation of the Snowe-Rockefeller-Exon-Kerrey Amendment. They include the Alliance for Community Media, the American Association for Adult and Continuing Education, the American Association of School Administrators, the American Library Association ("ALA"), the American Psychological Association, the Association for Education Communications and Technology, the Association for Supervision and Curriculum Development, the Association for the Advancement of Computing in Education, the Center for Media Education, the Consortium for School Networking ("CoSN"), the Council for American Private Education, the Council for Educational Development and Research, the Council of Chief State School Officers ("CCSSO"), Education Legislative Services, Inc. ("ELS"), the Educational Testing Service, the Federation of Behavioral, Psychological and Cognitive Services, the International Society for Technology in Education ("ISTE"), the International Telecomputing Consortium, the National Association of Counties, the National Association of Elementary School Principals, the National Association of Independent Schools ("NAIS"), the National Association of Secondary School Principals ("NASSP"), the National Association of State Boards of Education, the National Association of Student Financial Aid Administrators, the National Catholic Educational Association, the National Education Association ("NEA"), the National Grange, the National Rural Education Association, the National Rural Electric Cooperative Association, the National School Boards Association ("NSBA"), the Organizations Concerned about Rural Education, the Global Village Schools Institute, the United States Catholic Conference and the United States Distance Learning Association.

The NSBA is the nationwide advocacy organization for public school governance. NSBA represents the nation's 95,000 school board members. These board members govern 15,025 local school districts that serve more than 40 million public school students -- approximately 90 percent of all elementary and secondary students in the nation. Virtually all school board members are elected; the remainder are appointed by elected officials. NSBA's mission is to foster excellence and equity in public elementary and secondary education in the United States through local school board leadership. NSBA supports the capacity of each school board -- acting on behalf and in close concert with the people of its community -- to envision the future of education in its community, to establish a structure and environment that allow all students to reach their maximum potential, to provide accountability for the people of its community on performance in the schools, and to serve as the key community advocate for children and youth and their public schools.

The ALA is a nonprofit educational organization of 57,000 librarians, library educators, information specialists, library trustees, and friends of libraries representing

public, school, academic, state, and specialized libraries dedicated to the improvement of library and information services. A new five-year initiative, ALA Goal 2000, aims to have ALA and librarianship be as closely associated with the public's right to a free and open information society - intellectual participation - as it is with the idea of intellectual freedom. ALA Goal 2000 also emphasizes the importance of equity on the information superhighway and continues ALA's efforts to advocate for the highest quality of library and information services for all Americans.

The NEA, with over 2.2 million members, is the nation's largest professional employee organization, representing elementary and secondary teachers, higher education faculty, educational support personnel, retired educators, and students preparing to become teachers. NEA is focused on the issues and needs of education and the teaching profession.

The CoSN is a membership organization of institutions formed to further the development of computer-based networking among Kindergarten through 12th grade staff and students throughout the country. CoSN seeks to assure that schools develop sound networking systems and appropriate curricular applications. Our goal is for every classroom in the country to be connected to the Internet by the year 2000. We are working with other groups and policy makers to make sure all schools have affordable access to the NII.

The CCSSO is a nationwide, nonprofit organization comprised of the public officials who head the departments of elementary and secondary education and, in some states, other aspects of education in the state, five U. S. extra-jurisdictions, the District of Columbia, and the Department of Defense Schools. The Council has served as an independent voice on federal education policy since 1927, and has maintained an office in Washington, DC since 1948. Since 1908, chief state school officers have conferred with the U. S. Congress and federal agencies "to consider educational interests common to all states...which furthered by a free comparison of views." In representing the chief education administrators, the Council speaks on behalf of state education agencies, which have the primary authority for education in each state, and carries national influence commensurate with this position. The Council's members develop consensus on major issues, which the Council advocates before the President, federal agencies, the Congress and the public.

ELS is a private San Diego, California firm, with Washington, D.C. offices, that provides information, advocacy and assistance to its clients on a wide range of federal legislative and regulatory matters that affect public elementary and secondary education. It focuses on issues of funding, general, special and vocational education programs; child nutrition, health and safety; immigration and language proficiency; telecommunications and educational technology, among others. ELS's clients are California public school districts exclusively and include the following: Oakland Unified School District; San Diego Unified School District; Sacramento City Unified School

District; San Francisco Unified School District; Fresno Unified School District; Contra California Education Legislation Consortium; Long Beach Unified School District; West Contra Costa Unified School District.

NAIS is a voluntary membership organization of over 1,100 member schools and associations in the United States and abroad, and is the national institutional advocate for independent precollegiate education. NAIS represents 416,000 students, 53,200 teachers and instruction support personnel, and 8,600 administrators in the U.S.

ISTE is a nonprofit professional organization dedicated to the improvement of education through computer based technology. ISTE publishes journals, books and courseware to assist the technology using educator as well as providing training through distance learning courses and conferences such as the International Conference on Telecommunications in Education/Multimedia (TelEd).

NASSP is the nation's largest school administrator organization, representing middle, junior, and senior high school principals and assistant principals in both public and private schools. NASSP is also the founder and administrator of the National Association of Student Activity Advisors, the National Honor Society, and National Junior Honor Society, the National Association of Student Councils, and the American Technology Honor Society. NASSP represents 43,000 administrators, 200,000 teachers, and 1,000,000 students in the U.S.

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Certificate of Service

I hereby certify that I have caused to be mailed this 10th day of January, 1997,
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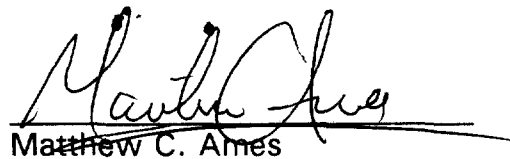
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